

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)

Implementation of the Pay Telephone)
Reclassification and Compensation)
Provisions of the Telecommunications)
Act of 1996)

CC Docket No. 96-128

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U S WEST, INC.'S
COMPARABLY EFFICIENT INTERCONNECTION PLAN
FOR PAYPHONE SERVICES

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January 6, 1997

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TABLE OF CONTENTS

	<u>Page</u>
SUMMARY	ii
I. INTRODUCTION.....	2
II. DESCRIPTION OF PAYPHONE SERVICES COVERED BY CEI PLAN....	2
A. Public Telephone Service	2
B. Semi-Public Telephone Service and Shared Payphone Service	4
C. Inmate Service	4
III. COMPLIANCE WITH CEI PARAMETERS	4
A. Interface Functionality	4
B. Unbundling of Basic Services	5
C. Resale	6
D. Technical Characteristics	7
E. Installation, Maintenance, and Repair	8
F. End-User Access.....	10
G. CEI Availability	11
H. Minimization of Transport Costs	12
I. Recipients of CEI	12
IV. OTHER NONSTRUCTURAL SAFEGUARDS	13
A. Allocation of Joint and Common Costs	13
B. Nondiscrimination Reporting	14
C. Disclosure of Network Information	14
D. Customer Proprietary Network Information ("CPNI")	15
E. Sample Tariffs/Catalogs/Price Lists.....	15
V. CONCLUSION	16

SUMMARY

In this Comparably Efficient Interconnection (“CEI”) Plan for Payphone Services, U S WEST outlines the manner in which it offers to Independent Payphone Providers (“IPPs”) on equal terms and conditions the basic services used with its payphone services. This CEI Plan describes U S WEST’s payphone services and the basic services used with them. In addition, it specifies the manner in which U S WEST complies with the nine “comparably efficient interconnection parameters” and other nonstructural safeguards in its offerings.

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U S WEST, INC.'S
COMPARABLY EFFICIENT INTERCONNECTION PLAN
FOR PAYPHONE SERVICES

U S WEST, Inc. (or "U S WEST"),¹ pursuant to the Common Carrier Bureau's
Orders in this proceeding,² hereby submits this Comparably Efficient
Interconnection Plan for Payphone Services.³

¹This Comparably Efficient Interconnection (or "CEI") Plan is filed on behalf of all of
U S WEST, Inc., including U S WEST Communications, Inc.

²In the Matter of the Implementation of the Pay Telephone Reclassification and
Compensation Provisions of the Telecommunications Act of 1996, CC Docket Nos.
96-128 and 91-35, Report and Order, FCC 96-388, rel. Sep. 20, 1996, Errata, DA 96-
1623, rel. Sep. 27, 1996, Further Errata, DA 96-1666, rel. Oct. 8, 1996 (hereinafter
"Order"); Order on Reconsideration, FCC 96-439, rel. Nov. 8, 1996, Erratum, DA 96-
1917, rel. Nov. 19, 1996 (hereinafter "Reconsideration Order").

³The terms of the CEI Plan are generally described in the Federal Communications
Commission's ("Commission") Report and Order. See In the Matters of:
Amendment of Sections 64.702 of the Commission's Rules and Regulations (Third
Computer Inquiry); and Policy and Rules Concerning Rates for Competitive
Common Carrier Services and Facilities Authorizations Thereof; Communications
Protocols under Section 64.702 of the Commission's Rules and Regulations, Report
and Order, 104 FCC 2d 958 (1986) ("Phase I Order").

I. INTRODUCTION

In this proceeding, the Commission deregulated payphone equipment and required local exchange carriers ("LECs") to provide the same basic payphone services to Independent Payphone Providers ("IPPs") as they provide to their own affiliated payphone operations. In addition, the Commission imposed additional nonstructural safeguards on the Bell Operating Companies ("BOCs"). Specifically, the Commission required BOCs to file an initial CEI Plan describing how they intend to comply with the CEI equal access parameters and nonstructural safeguards for the provision of payphone services.⁴ This plan demonstrates how the U S WEST companies comply with each of these requirements. U S WEST intends to continue to operate its payphone business on an integrated basis through U S WEST Public Services which is part of U S WEST Communications, Inc.

II. DESCRIPTION OF PAYPHONE SERVICES COVERED BY CEI PLAN

U S WEST Public Services provides site providers with three types of payphone service: Public Telephone Service, Semi-Public Telephone Service and Shared Payphone Service, and Inmate Service.

A. Public Telephone Service

This service is available as outgoing only or two-way service and can be coin or coinless. Following are Public Telephone Service options:

⁴Order ¶ 202.

Coin-Operated Payphone Service (Classic Payphone) - The payphone set relies on central office control to collect and return coins. End users have access to local, toll, and operator network services. Payment options available to end users are cash or billing as collect, third party, or calling card.

Coin-Operated Payphone Service (Smart Payphone) - The payphone set has smart capabilities to rate calls as well as to collect and return coins. It has the ability to rate and route toll calls and provide station-based operator services. Payment options available to end users are cash or billing as collect, third party, or calling card.

Card and Coin Payphone Service (Advanced Payphone) - The payphone equipment has smart capabilities to rate calls as well as to collect and return coins. It has the ability to rate and route toll calls and to provide station-based operator services. End users have access to local, toll, and operator network services. Payment options available to end users are cash, billing as collect, third party or calling card, commercial credit card, or cash card.

Coinless Payphone Service - The payphone set relies on central office and operator systems for the control of rating and billing. It has a unique screening feature that prohibits direct-dialed-call billing. End users have access to local and toll services. Payment options available to end users are limited to billing as collect, third party, or calling card.

B. Semi-Public Telephone Service and Shared Payphone Service

The payphone set relies on central office control to collect and return coins. End users have access to local, toll, and operator network services. Payment options available to end users are cash or billing as collect, third party, or calling card. Semi-Public Telephone Service and Shared Payphone Service have separate monthly service charge arrangements billed to the site provider to achieve full cost recovery.

C. Inmate Service

The payphone set relies on central office and operator or premises-based call management systems for the control of rating and billing. It has unique screening that prohibits direct-dialed calls, calling-card, and third-number billing. This service option provides end users access to local and toll services on a collect billing arrangement.

III. COMPLIANCE WITH CEI PARAMETERS

A. Interface Functionality

This CEI parameter requires standardized hardware and software interfaces that are able to support transmission, switching, and signaling functions identical to those utilized in the payphone service provided by the carrier.⁵

The U S WEST payphone services described in Section II and payphone services of IPPs will access the network through existing network interfaces

⁵Phase I Order at 1039 ¶ 157.

available through U S WEST's standard network disclosure procedures which comply with the Commission's network disclosure rules.⁶ U S WEST Public Services uses no interface, signaling, abbreviated dialing, derived channels, or other unique capabilities to access U S WEST's basic services which are not also available to IPPs in tariffed form or through published price lists or catalogs. If such access arrangements are to be made available to U S WEST Public Services, they will be made available to IPPs at the same time, in the same jurisdictions, and on the same terms and conditions. U S WEST also will comply with all applicable network disclosure requirements.⁷

B. Unbundling of Basic Services

This CEI parameter requires that basic services underlying a carrier's payphone service offering be unbundled and made available to competing providers.⁸ Some of the basic services that are used with U S WEST's payphone services are currently available on an unbundled basis through state tariffs, catalogs, or price lists. Tariffs, catalogs, or price lists for the remaining basic services that are used with U S WEST's payphone services will be filed in U S WEST's 14 states. All features and functions associated with these basic services are available to IPPs on the same basis as they are available to U S WEST

⁶Id. at 1083-85 ¶¶ 252-53.

⁷See id.

⁸See id. at 1040 ¶ 158.

Public Services. A description of the payphone basic services and features is attached as Exhibit A.

Any additional basic services or features to be used by U S WEST Public Services will be added to this CEI Plan by way of amendment prior to their use. Similarly, in any jurisdiction where U S WEST Public Services is to utilize any of these basic services or features, these basic services or features will be made available to IPPs on an unbundled basis at the time they are made available to U S WEST Public Services.

In addition, U S WEST will respond to IPPs' additional requests for unbundled basic services through the existing 120-day process. U S WEST will make the requested unbundled basic services available where such requests comply with the factors established by the Commission for selection of initial Open Network Architecture ("ONA") services: market demand, utility as perceived by IPPs, and costing and technical feasibility.⁹

C. Resale

This CEI parameter requires that a carrier's payphone service operations take basic services used in its payphone service offerings at their unbundled,

⁹In the Matter of Filing and Review of Open Network Architecture Plans, Memorandum Opinion and Order, 4 FCC Rcd. 1, 207 ¶ 396 (1988).

tariffed rates.¹⁰ U S WEST Public Services will impute the tariffed rates for all basic services used to provide its payphone services.¹¹

D. Technical Characteristics

This CEI parameter requires that a carrier provide basic services with technical characteristics that are equal to those of the basic services it uses with its own payphone services.¹²

Interconnection to the U S WEST basic services used to support its payphone services is through existing standard network interfaces. The facilities provided to U S WEST Public Services and IPPs comply fully with the Commission's parameters for technical equality, i.e., no user-perceived qualitative differences and no systematic differences in measured quality.

U S WEST utilizes only inventoried facilities (i.e., lines and associated equipment) that have passed acceptance tests prescribed by established practices and/or tariffs, catalogs, or price lists. These tests are graded on a pass/fail basis. If any of these facilities do not pass the acceptance test, they are either excluded from inventory or are improved to pass the test. All equipment associated with the facilities is also tested for proper operation and transmission levels. Testing and acceptance of this equipment is performed without regard to the type of customer or

¹⁰See Phase I Order at 1035-37 ¶¶ 147-50, 1064-66 ¶¶ 214-17.

¹¹When the term "tariffed" is used in this context in this document, it can refer to tariffs, price lists, or catalogs, depending on state regulation.

¹²Phase I Order at 1041 ¶ 160.

intended use of the circuit. As a result of these procedures, the technical characteristics of all circuits associated with U S WEST's basic services that are used with payphone services are the same.

Finally, pursuant to Commission requirements, U S WEST Communications, Inc. has filed annual affidavits since March 1990 attesting that proper procedures have been followed and that no discrimination has occurred in its provision of the basic services used with its enhanced services.¹³ Future affidavits will aggregate all U S WEST basic services offered pursuant to CEI plans, including the basic services used with payphone services.

E. Installation, Maintenance, and Repair

This CEI parameter requires that the time periods for installation, maintenance, and repair of the basic services and facilities included in a CEI offering must be the same as those the carrier provides to its own payphone service operations.¹⁴

U S WEST's procedures for processing orders and installing and maintaining payphone lines assure that there can be no discrimination between U S WEST

¹³ See In the Matters of: Amendment to Sections 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry); and Policy and Rules Concerning Rates for Competitive Common Carrier Service and Facilities Authorizations Thereof, Communications Protocols under Sections 64.702 of the Commission's Rules and Regulations, Memorandum Opinion and Order on Reconsideration, 3 FCC Rcd. 1150, 1160 ¶ 76 (1988) ("Phase II Reconsideration Order").

¹⁴ Phase I Order at 1041 ¶ 161.

Public Services and IPPs. U S WEST Public Services will be subject to the same scheduling procedures and time periods as IPPs.

Due dates for routine installation orders are based on standard intervals for the types and quantities of services required, not on the identity of the party placing the order. U S WEST maintenance/repair intervals are based upon standard guidelines (i.e., for type of trouble) which are applied to all customers without regard to customer affiliation. Further, the design of U S WEST's mechanized maintenance systems prevents service intervals from being changed once the repair activity has been posted. For basic services used with payphone services, the customer restoration interval commitment is based upon predetermined standard maintenance intervals which are updated periodically to reflect work force availability and work load volume.

U S WEST Public Services and IPPs will have comparable access to U S WEST's Operation Support Systems supporting installation, maintenance, and repair functions. Orders for site providers of U S WEST and IPPs will be entered into a service order negotiation and retrieval system ("Service Order System"). The Service Order System distributes service requests to a service order processor ("Processor") which redistributes orders to various downstream mechanical and manual dispatching/provisioning systems to coordinate all installation activity. From the Processor, orders are automatically routed to a mechanized facilities assignment system where loop facilities are automatically assigned using data from various other databases. Also from the Processor, orders proceed to a computer

system for central office facilities ("Central Office Assignment System"). Within the Central Office Assignment System, telephone numbers and central office equipment are selected on a "first- come, first- served" basis. Orders are dispatched through a work force administration system ("Work Force System") directly to a technician.

A loop maintenance system will receive trouble reports on both U S WEST payphone lines and the lines used with IPP payphone services. Trouble reports will flow from the loop maintenance system through the Work Force System directly to a technician.

In the area of training and education, U S WEST will ensure that all personnel associated with the provisioning of network services understand and apply the Commission's nondiscrimination rules applicable to payphone services. These employees will review annually the rules on nondiscrimination. Employees will be advised that violation of those rules may lead to disciplinary action, up to and including dismissal.

F. End-User Access

This CEI parameter requires that if a carrier offers end users the ability to use abbreviated dialing or signaling to activate or access the carrier's payphone service offerings, it must provide the same capabilities to end users of all payphone services that utilize the carrier's facilities.¹⁵ The same basic services identified in Exhibit A will be tariffed and available to U S WEST Public Services and IPPs.

¹⁵ Id. ¶ 162.

G. CEI Availability

This CEI parameter requires that a carrier's CEI offering must be fully operational and available on the date that it offers its corresponding payphone service to the public. In addition, the carrier must specify a reasonable time prior to this date during which prospective users of CEI can utilize the CEI facilities and services for purposes of testing their payphone service offerings.¹⁶

The basic services identified in Exhibit A are currently, or will be, available to IPPs under tariff, catalog, or price list. If and when other basic services are to be deployed, U S WEST will make testing capability available to IPPs at the same time that such capability is available to U S WEST Public Services. U S WEST will not utilize any basic payphone service except pursuant to this CEI Plan.

The Commission should not enforce the prior testing requirement of this CEI parameter for U S WEST's Smart Public Access Line ("PAL") Service. U S WEST Public Services has been using Smart PAL Service with its Classic Payphone offering for many years. To meet the prior testing requirement, U S WEST would have to suspend offering its Classic Payphone Service for an interim period to allow IPPs an opportunity to test Smart PAL Service. It is inconceivable that Congress or the Commission intended U S WEST to suspend its payphone operations to allow IPPs to test the underlying basic service. Consequently, the Commission should refrain from applying the prior testing requirement to U S WEST's Smart PAL Service.

¹⁶Id. ¶ 163.

H. Minimization of Transport Costs

In its Phase I Order, the Commission required carriers to demonstrate in their CEI plans the steps the carrier would take to reduce transport costs for competitors.¹⁷ As explained in the Phase II Reconsideration Order, this requirement was designed to reduce transmission cost differences between collocated BOC enhanced service operations and non-collocated enhanced service providers.¹⁸ The Commission further stated: "When such differences do not exist, no action is required to further minimize transmission costs."¹⁹ U S WEST Public Services utilizes the same tariffed services as IPPs, and, therefore, no such differences in transmission costs exist. As a result, U S WEST satisfies this CEI parameter.

I. Recipients of CEI

This CEI parameter requires that carriers not restrict the availability of CEI to any particular payphone service provider.²⁰ U S WEST Public Services and IPPs access the same tariffed basic services.

¹⁷Id. at 1042 ¶ 164.

¹⁸See Phase II Reconsideration Order at 1155 ¶¶ 32-34.

¹⁹See In the Matter of Pacific Bell and Nevada Bell, Plan for the Provision of Voice Mail Services, Memorandum Opinion and Order, 3 FCC Rcd. 1095, 1098 ¶ 35 (1988) (footnote omitted).

²⁰Phase I Order at 1042 ¶ 165.

IV. OTHER NONSTRUCTURAL SAFEGUARDS

A. Allocation of Joint and Common Costs

In the Joint Cost Order, the Commission adopted rules for the allocation of costs between regulated and nonregulated services provided by carriers subject to its jurisdiction. In the Phase II Order, the Commission required as part of its CEI requirements that the BOCs comply with those rules.²¹ U S WEST's cost allocation procedures for basic payphone services will be consistent with these rules and with U S WEST's Cost Allocation Manual ("CAM") submitted to the Commission pursuant to the Joint Cost Order.²² U S WEST will identify and report specific accounts, cost pools, and allocators that are required to capture the nonregulated investment and expense associated with U S WEST's payphone operations. To the extent that U S WEST will have changes to its cost pools, it will revise and file its CAM with the Commission no later than February 14, 1997.

²¹See In the Matters of: Amendment to Sections 64.702 of the Commission's Rules and Regulations (Third Computer Inquiry); and Policy and Rules Concerning Rates for Competitive Common Carrier Service and Facilities Authorizations Thereof, Communications Protocols under Sections 64.702 of the Commission's Rules and Regulations, Report and Order, 2 FCC Rcd. 3072, 3082 ¶ 72, 3099 ¶ 184 (1987) ("Phase II Order").

²²See Separation of Costs of Regulated Telephone Service from Costs of Nonregulated Activities, 2 FCC Rcd. 1298 (1987), on recon., 2 FCC Rcd. 6283 (1987), on further recon., 3 FCC Rcd. 6701 (1988) ("Joint Cost Order"). See also In the Matter of U S West's Permanent Cost Allocation Manual for the Separation of Regulated and Nonregulated Costs, Memorandum Opinion and Order, 3 FCC Rcd. 195 ¶ 3 (1988).

B. Nondiscrimination Reporting

U S WEST tracks promised installation dates met and maintenance time intervals for basic services used with its payphone services and for those provided to IPPs via USOCs or field identifier codes in the service order process.

Nondiscrimination reports, which are prepared and filed quarterly, will include:

- i. The percentage of installation orders for which the promised intervals were met for basic services used by U S WEST Public Services and for all others; and
- ii. The average duration of reported troubles or outages for basic services used by U S WEST Public Services, and for all others.

These reports will be aggregated with other U S WEST services offered pursuant to CEI plans, and a single report will be filed for all such services.

C. Disclosure of Network Information

All new services and network interfaces offered by U S WEST have been and will be disclosed pursuant to the Commission's network disclosure rules.²³

U S WEST has procedures in place to comply with these rules.

²³ See note 6, supra.

D. Customer Proprietary Network Information ("CPNI")

The Commission requires a BOC to explain in its CEI plan how it will comply with the CPNI requirements of Section 222 of the Communications Act²⁴ and of the Computer III and ONA proceedings, to the extent that the latter requirements are not inconsistent with the former.²⁵ Consistent with U S WEST's past practices, CPNI related to the basic payphone services to which an IPP or U S WEST Public Services subscribes will not be available to or accessible by any other payphone service provider absent affirmative direction otherwise by the subscribing payphone service provider. These procedures comply with the Commission's current rules governing use of CPNI to support enhanced services.

E. Sample Tariffs/Catalogs/Price Lists

Exhibit B provides a list of tariff, catalog, and price list references that indicate the jurisdictions where U S WEST basic services and features used with payphone services are offered. Also, sample tariffs, catalogs, or price lists for the basic services and features described in Exhibit A are provided in Exhibit B.

Smart PAL Service is not tariffed in U S WEST's states. Tariffs, catalogs, or price lists will be filed by January 15, 1997, depending on state regulation. Upon approval, this basic service will be available to IPPs from central offices equipped

²⁴ 47 U.S.C. § 222.

²⁵ Order ¶ 205.

with the appropriate functionalities. An illustrative tariff is provided in Exhibit B in lieu of the respective tariffs, catalogs, or price lists.

Basic PAL Service is provided pursuant to state tariffs, catalogs, or price lists in U S WEST's 14 states. Sample tariffs/catalogs are provided in Exhibit B.

Pursuant to state orders, Single Party Flat Rate Service - Business is tariffed in Iowa and Minnesota for use with payphone services. A sample tariff is provided in Exhibit B.

Answer Supervision - Line Side, Blocking for 10XXX1+/10XXX011+, Billed Number Screening, and CUSTOMNET Service are features associated with Basic PAL Service that are unbundled in some of U S WEST's 14 states. Because these basic features are unbundled, federal tariffs for these features will be filed with the Commission by January 15, 1997. An illustrative federal tariff is provided in Exhibit B. Exhibit B also provides sample state tariffs, catalogs, and price lists for these basic features.

V. CONCLUSION

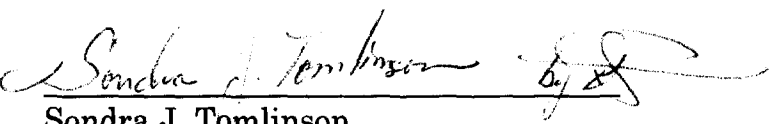
U S WEST has demonstrated that its provision and use of basic payphone services comply with all Commission-mandated CEI requirements and serve the public interest. As a result, U S WEST requests approval of this CEI Plan for

Payphone Services on or before April 15, 1997, so that U S WEST can begin collecting interim compensation at the same time the Carrier Common Line subsidy charge is removed.

Respectfully submitted,

U S WEST, INC.

By:

A handwritten signature in cursive script, appearing to read "Sondra J. Tomlinson", followed by a large, stylized flourish or initial.

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Of Counsel,
Dan Poole

January 6, 1997

EXHIBIT A

U S WEST Basic Services and Features

Basic Services

Smart Public Access Line (Smart PAL)

A voice grade circuit switched line provides a payphone service provider with a line side connection to the circuit switched network. This line side connection could include alternative types of network connection, address and supervisory in-band or out-of-band signaling. In addition, the line determines when a coin should be collected or returned and, through Automated Coin Toll Service (ACTS), rates all coin paid long distance calls.

Basic Public Access Line (Basic PAL)

A voice grade circuit switched line provides a payphone service provider with a line side connection to the circuit switched network. This line side connection could include alternative types of network connection, address and supervisory in-band or out-of-band signaling. The pay telephone set contains micro processors which perform all the required coin control functions and coin sent paid rating.

Single Party Flat Rate - Business (1FB) (Only Iowa and Minnesota as permitted by State Regulatory Commissions)

A voice grade circuit switched line provides a payphone service provider with a line side connection to the circuit switched network. This line side connection could include alternative types of network connection, address and supervisory in-band or out-of-band signaling.

Basic Features

Answer Supervision - Line Side

Passes the network answer supervision signal to the receiving payphone.

Blocking for 10XXX1+/10XXX011+

Blocks 10XXX1+/10XXX011+ calls while allowing 10XXX0 calls.

International Blocking

Blocks 011+/10XXX011+ calls.

Billed Number Screening (Incoming Fraud Protection)

An indicator to the operator that collect or third number billed calls cannot be billed to the line.

CUSTOMNET (Outgoing Fraud Protection)

Appears on operator work station for 0- calls and tells the operator what calls and billing options to allow or disallow.

EXHIBIT B

INDEX

Tariff/Price List/Catalog References for Basic Services and Features

Illustrative State Tariff for Smart Public Access Line Service

Illustrative FCC Tariff for Basic Features

State Tariffs/Catalogs for Basic Public Access Line Service

Colorado

Southern Idaho

Washington

State Tariff for Single Party Flat Rate Service - Business

Minnesota

State Catalog for Answer Supervision - Line Side

Nebraska

State Tariff for Blocking for 10XXX1+/10XXX011+

Arizona

State Price List for International Blocking Service

Minnesota

FCC Tariff for International Blocking Service

State Tariff for Billed Number Screening (Incoming Fraud Protection)

Oregon

State Tariff for CUSTOMNET (Outgoing Fraud Protection)

Oregon